



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

April 23, 2021

Via ECF

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Geovanny Fuentes Ramirez*, S6 15 Cr. 379 (PKC)**

Dear Judge Castel:

On March 22, 2021, following trial, Geovanny Fuentes Ramirez (the “defendant”) was convicted of all three counts in the above-referenced Indictment. On March 25, 2021, the Court granted the defendant’s motion to extend the time within which to file any post-trial motions to April 23, 2021. (*See* ECF No. 277). Today, on April 23, the defendant filed motions seeking to set aside the verdict or for a new trial. (*See* ECF No. 316). The Government respectfully requests until May 21, 2021 to file its response to the defendant’s post-trial motions.

Respectfully submitted,

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Cc: Defense Counsel  
(Via ECF)